

**Remarks**

Applicants have amended the written description application and claims, cancelled claims 11 and 13 without prejudice and added new claims 21 and 22 as shown above. Support for the amendments and new claims may be found in the written description as filed at, e.g., page 1, line 3, page 7, lines 6-11 and 15-19, page 9, lines 28-29, page 10, lines 6-7 and 16-17, page 12, lines 16-26, page 13, lines 6-18, page 17, lines 21-24, page 18, lines 1-2, page 20, lines 1-5, page 21, lines 28-29, page 24, lines 8-11, page 25, lines 21-23, page 27, lines 8-11 and claims 1, 8, 11 and 12. Following entry of this amendment, claims 1-10, 12 and 14-22 will be pending in this application with claims 11 and 13 having been canceled and claims 16-20 having been withdrawn.

Applicants request reconsideration in view of the following remarks.

**REJECTION OF CLAIMS 1-15 UNDER 35 U.S.C. §112**

Claims 1-15 were rejected under 35 U.S.C. §112, second paragraph, on grounds set out at pages 2-3 of the Office Action. Applicants have amended claims 1 and 10 as shown above. Applicants believe the rejection is now moot and accordingly request its withdrawal.

**REJECTION OF CLAIMS 1-15 UNDER 35 U.S.C. §§102/103**

Claims 1-15 were rejected under 35 U.S.C. §102(b) as anticipated by or, in the alternative, under 35 U.S.C. §103(a) as obvious over U.S. Patent No. 5,403,455 (Candor), on grounds set out at pages 4-5 of the Office Action. Applicants request reconsideration.

Candor does not show or suggest the apparatus of rejected claims 1-15 for at least the reason that Candor has not been shown to disclose or suggest first and second filtration membranes comprising “a woven textile having at least one conductive element woven into at least a part thereof to form” a first or second electrode. The recited filtration membrane/conductive element structure in applicants’ claimed apparatus allows a high degree of control over the conductive element spatial configuration, and thus over the electric current flow pattern through a material to be dewatered. This is due in part to the inherent flexibility and adaptability of weaving techniques, which also enable creation of a variety of electrode patterns and filtration membrane structures in a single manufacturing process. The recited

electrical contact and partial exposure features in applicants' claimed apparatus facilitate electrical connection to and electrical energy distribution within applicants' recited electrodes. Applicants accordingly request withdrawal of the 35 U.S.C. §102 rejection of claims 1-15 as anticipated by or, in the alternative, under 35 U.S.C. §103 as obvious over Candor.

### Conclusion

Applicants have made an earnest effort to resolve all issues and to place the application in condition for allowance. The Examiner is encouraged to call the undersigned attorney if there are any questions or suggestions regarding this Amendment or the application.

Respectfully submitted on behalf of  
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